

Paul W. Shakespear (14113)
Cameron Cutler (15116)
Natalie Beal (18311)
SNELL & WILMER L.L.P.
15 West South Temple
Suite 1200
Gateway Tower West
Salt Lake City, Utah 84101
Telephone: 801.257.1900
Facsimile: 801.257.1800
Email: pshakespear@swlaw.com
ccutler@swlaw.com
nbeal@swlaw.com

Abram I. Moore (admitted *pro hac vice*)
Christian A. Zazzali (admitted *pro hac vice*)
K&L GATES LLP
70 West Madison St., Suite 3100
Chicago, IL 60602
Telephone: 312.781.6010
Facsimile: 312.827.8000
Email: abe.moore@klgates.com
christian.zazzali@klgates.com

Attorneys for Plaintiff Eric Schiermeyer

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC,

Defendants,

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A GALA GAMES,

Nominal Defendant.

**MOTION FOR LEAVE TO FILE
OVERLENGTH REPLY IN
SUPPORT OF MOTION TO
FREEZE ASSETS, FOR AN
ACCOUNTING, AND FOR
EXPEDITED DISCOVERY AND
MEMORANDUM IN SUPPORT
AND REQUEST FOR IMMEDIATE
HEARING**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielson

Magistrate Judge Daphne A. Oberg

Plaintiff Eric Schiermeyer (“Plaintiff”), through counsel and pursuant to Local Rule DUCivR 7-1(a)(6), respectfully moves for leave to file an overlength Reply in Support of Motion to Freeze Assets, for an Accounting, and for Expedited Discovery and Memorandum in Support and Request for Immediate Hearing (“Reply”).

Plaintiff seeks leave to file a Reply in support of his Motion to Freeze Assets, for an Accounting, and for Expedited Discovery and Memorandum in Support and Request for Immediate Hearing (“Motion”) that is up to but no more than 15 pages overlength, or approximately 25 pages total, excluding those items listed in Local Rule 7-1(a)(5)(B). Good cause exists justifying Defendant’s request for additional pages. The Motion seeks emergency relief (freezing certain assets, an accounting, and expedited discovery) relating to Defendants’ theft of \$130,000,000 worth of assets. In response, Defendants filed a 25-page opposition [ECF No. 27] that attached True North United Investments, LLC’s 25-page verified complaint. Defendants’ Opposition also referred to five separate declarations [ECF Nos. 28-32], which attached eight exhibits and included multiple screenshots of other documents. Due to the complexity of the issues at hand and volume of information proffered by Defendants in their defense, Plaintiff requires more than 10 pages to reply to Defendants’ Opposition and to further support the relief sought in the Motion to Freeze Assets. Accordingly, Plaintiff respectfully requests leave to file a Reply that is up to 25 pages total, or 15 pages overlength, in order to adequately set forth the facts and law necessary to the resolution of a motion of this importance.

Plaintiff submits a proposed Order concurrently with this Motion.

Dated: September 13, 2023.

SNELL & WILMER L.L.P.

/s/ Paul W. Shakespear

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K&L GATES LLP

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Attorneys for Plaintiff Eric Schiermeyer